

1 The Honorable Richard A. Jones  
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10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

12 WILLIAM ANDERSON,

13 NO. C09-0850 RAJ

14 Plaintiff,

15 v.

16 THE BASEBALL CLUB OF SEATTLE  
17 d/b/a/ THE SEATTLE MARINERS; THE  
18 CITY OF SEATTLE; JASON WEAVING;  
19 LARRY HARVEY; LARRY MEYER;  
20 OFFICER TIMOTHY RENIHAN; TRENT  
21 BERGMAN; OFFICER DAVID SULLIVAN;  
22 OFFICER JUAN ORNELAS; and JOHN  
23 DOE NOS. 1-10,

Defendants.

**DECLARATION OF TED BUCK  
IN SUPPORT OF CITY  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

**NOTE ON MOTION CALENDAR:  
NOVEMBER 12, 2010**

18 TED BUCK declares under oath and on the basis of personal knowledge:

19 1. I am one of the attorneys representing the City of Seattle and the  
20 defendant officers in this matter.

21 2. The exhibits described in and attached to this declaration are all true and  
22 correct copies of documents generated or received and maintained by our office in the  
23 ordinary course of its representation of The City of Seattle.

DECLARATION OF TED BUCK IN SUPPORT OF  
CITY DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT - 1

C09-0850 RAJ  
3019-030590 601868x

**STAFFORD FREY COOPER**

PROFESSIONAL CORPORATION

601 Union Street, Suite 3100

Seattle WA 98101.1374

TEL 206.623.9900 FAX 206.624.6885

1      **Exhibit 1**      Excerpts from the deposition testimony of William Anderson taken  
2      July 7, 2010.

3      **Exhibit 2**      Consumer Service Bureau Workflow report created 1/5/2005.

4      **Exhibit 3**      Excerpts from the deposition testimony of Timothy Renihan taken  
5      August 4, 2010.

6      **Exhibit 4**      Excerpts of plaintiff's responses to City Defendant's First  
7      Interrogatories and Requests for Production dated June 17, 2010.

8      **Exhibit 5**      Plaintiff's responses to Defendant Baseball Club of Seattle's First  
9      Interrogatories, Requests for Production and Requests for  
10      Admission dated June 17, 2010.

11      **Exhibit 6**      Seattle Police Department Policy and Procedure regarding off-duty  
12      employment.

13      **Exhibit 7**      Secondary Employment Permit of Timothy Renihan.

14      **Exhibit 8**      Incident Report dated June 18, 2006.

15      **Exhibit 9**      Incident Report dated August 26, 2006.

16      **Exhibit 10**      Incident Report dated August 27, 2006

17      **Exhibit 11**      Citation dated April 14, 2009

18      **Exhibit 12**      City of Seattle Ordinance No. 119534  
19      Excerpts of Agreement between City of Seattle and The Baseball  
20      Club of Seattle.

21      **Exhibit 13**      Excerpts from the deposition testimony of Trent Bergmann taken  
22      July 12, 2010

23      **Exhibit 14**      Excerpts from the deposition testimony of Lawrence Meyer taken  
24      July 26, 2010.

25      **Exhibit 15**      Excerpts from the deposition testimony of Juan Ornelas taken  
26      September 16, 2010

DECLARATION OF TED BUCK IN SUPPORT OF  
CITY DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT - 2

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1 I CERTIFY under penalty of perjury according to the laws of the State of  
2 Washington and of the United States that the foregoing is true and correct.

3 DATED at Seattle, Washington, this 20<sup>th</sup> day of October, 2010.

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5 /s/ Ted Buck via ECF

6 TED BUCK

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DECLARATION OF TED BUCK IN SUPPORT OF  
CITY DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT - 3

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## **Certificate of Service**

I certify that on the date noted below I electronically filed this document entitled DECLARATION OF TED BUCK IN SUPPORT OF CITY DEFENDANTS' MOTION FOR SUMMARY JUDGMENT with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

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*Attorneys for Defendant Baseball  
Club of Seattle d/b/a The Seattle Mariners*

DATED this 20<sup>th</sup> day of October, 2010, at Seattle, Washington.

/s/ Ted Buck via ECF

DECLARATION OF TED BUCK IN SUPPORT OF  
CITY DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT - 4

C09-0850 RAJ  
3019-030590 601868x

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